

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	No. 22-11923 PMM
LINDA P. SWEENEY	:	
a/k/a LINDA PORR-SWEENEY	:	Chapter 7
JOSEPH V. SWEENEY, JR.	:	
Debtors	:	
 M&T BANK	:	
	:	
Movant	:	
	:	
	:	
v.	:	
	:	
	:	
LINDA P. SWEENEY	:	
a/k/a Linda Porr-Sweeney	:	
JOSEPH V. SWEENEY JR.	:	
Debtors	:	
	:	
	:	
CHRISTINE C. SHUBERT	:	
	:	
Trustee	:	
	:	

**DEBTORS' ANSWER TO MOTION OF M&T BANK FOR
RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362**

The Answer of Linda P. Sweeney and Joseph V. Sweeney Jr. (“Debtors”) to the Motion of M&T Bank (“Movant”) for Relief from the Automatic Stay Under Section 362 (the “Motion”), is as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted. However, Debtors are able to cure said arrears.

7. Admitted in part, denied in part. Debtors admit that Movant may seek an award of fees and expenses. Debtors deny that such fees and expenses are due if they are not reasonable.

8. Admitted.

9. Debtors lack knowledge or information sufficient to form a belief about the truth of the allegation that the total payoff for the loan is \$1,047,169.56.

10. Admitted.

11. Denied. Schedule D speaks for itself.

12. Denied. Debtors deny that Movant is entitled to relief from the stay for cause as Debtors are able to cure the alleged default.

13. Admitted.

WHEREFORE, Debtors request this Honorable Court deny the relief requested by M&T Bank and that Debtors be awarded such other and further relief as is just and proper.

Respectfully submitted:

CUNNINGHAM, CHERNICOFF
& WARSHAWSKY, P.C.

By: s/ James K. Jones

Robert E. Chernicoff, Esquire
Attorney I.D. No. 23380
James K. Jones, Esquire
Attorney I.D. No. 39031
2320 North Second Street
P. O. Box 60457
Harrisburg, PA 17106-0457
(717) 238-6570

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